

12/21/2009

RE: Yuasa Battery

Martin Matlin/R3/USEPA/US

11/23/2009 09:52 AM

To matlin.martin@epa.gov

cc

bcc

Subject RE: Yuasa Battery

----- Forwarded by Martin Matlin/R3/USEPA/US on 11/23/2009 09:52 AM -----

"Daub Robin"

<daubr@yuasainc.com>

11/20/2009 01:25 PM

To Martin Matlin/R3/USEPA/US@EPA

cc

Subject RE: Yuasa Battery

Martin,

We had another surprise HW inspection; this time from DEP on Wednesday, November 18. Steve Unger and a trainee did the facility inspection on Wednesday and returned on Thursday morning to review records.

Today he delivered the report for my signature; and, I thought that I should forward to you. The report may help to backup my statement to you that your first visit here (when my HW handler and I were both on vacation); which occurred right after our plant shutdown, indeed was the worst day of the year that you could have chosen.

Please call or reply with any questions, although I will be on lay-off next week, returning December 1st.

Have a Happy Thanksgiving!

Robin S. Daub
EHS Manager
Yuasa Battery, Inc.
2901 Montrose Avenue
Reading, PA 19605
Phone (610)921-5228
Fax (610)929-8653
daubr@yuasainc.com

-----Original Message-----

From: Matlin.Martin@epamail.epa.gov [mailto:Matlin.Martin@epamail.epa.gov]
Sent: Thursday, October 08, 2009 8:53 AM
To: Daub Robin
Subject: RE: Yuasa Inspection

Thank you for the documents and updates, Robin. I'm very sorry for your loss.

Thanks,

...epa.gov/.../bf192f66159bd342852576...

12/21/2009

RE: Yuasa Battery

Martin

Martin Matlin (3LC70)
Office of Land Enforcement
U.S. EPA Region III
1650 Arch St., Philadelphia, PA 19103-2029
(215) 814-5789
(215) 814-3163 (fax)

"Daub Robin"
<daubr@yuasainc.
com>

10/07/2009 04:53
PM

Martin Matlin/R3/USEPA/US@EPA

To

cc

Subject

RE: Yuasa Inspection

Hi Martin,

I apologize for the confusion last week, Mark tried his best with me out the whole week on bereavement leave.

I am attaching the corrected drawing for haz waste locations (the one he sent you last week had errors on it); which is now in the updated Spill/Contingency Plan in Appendix F, and includes locations of spill cleanup equipment. I also attached the updated plan which has not been scanned yet with signatures and drawings. But, you will notice in Appendix F that I also added a section for Haz Waste Handlers.

Copies of (Fire Chief) Dan Miller's annual training is also included.

Dan and I discussed the missing inspection reports and we both came to the same conclusion. All the reports were pulled out of the files for the DEP HW inspection in August of 2008. Somehow they had to be misplaced at that time when we were copying records, or they were accidentally taken by the inspector with the copies.

It is the only thing that makes sense because all the inspections for 2008 after August are here.

I can try to contact the DEP inspector, Steven Unger, to see if he has any knowledge of the files from last year. Please contact me with any further questions.

Sorry for the inconvenience,

Robin S. Daub

12/21/2009

RE: Yuasa Battery

EHS Manager
Yuasa Battery, Inc.
2901 Montrose Avenue
Reading, PA 19605
Phone (610)921-5228
Fax (610)929-8653
daubr@yuasainc.com

-----Original Message-----

From: Matlin.Martin@epamail.epa.gov [
<mailto:Matlin.Martin@epamail.epa.gov>]
Sent: Monday, September 28, 2009 8:53 AM
To: Daub Robin
Subject: Re: Yuasa Inspection

Thanks very much Robin!

Martin

Martin Matlin (3LC70)
Office of Land Enforcement
U.S. EPA Region III
1650 Arch St., Philadelphia, PA 19103-2029
(215) 814-5789
(215) 814-3163 (fax)

"Daub Robin"
<daubr@yuasainc.
com>

09/25/2009 03:27
PM

Martin Matlin/R3/USEPA/US@EPA

To

cc

Subject

Yuasa Inspection

Martin,

Attached is the copy of the Yuasa Spill Prevention/Control Plan updated January 2009. I will forward the updated Appendix F to you on Monday. Our engineer is changing the drawing of hazardous waste storage areas to include the spill equipment locations, which are currently found on page

12/21/2009

RE: Yuasa Battery

17 of the plan. I am adding the hazardous waste operators with job descriptions to this appendix as well.

At this time, we have not located the balance of the inspection logs for 2007. I know that we had the complete file for our HW inspection in 2008? I have also left a message with Emily, who resigned on August 28, if she has any information on the missing file.

It was nice 'meeting' you again and very unusual that you inspected my location at my previous position at Tyler Pipe. I miss that place!

Have a nice weekend,

Robin

<<SPCC rev.2_012507 JANUARY 2009.doc>>

Robin S. Daub
EHS Manager
Yuasa Battery, Inc.
2901 Montrose Avenue
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Phone (610)921-5228
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[attachment "SPCC rev.2_012507 JANUARY 2009.doc" deleted by Martin Matlin/R3/USEPA/US]

[attachment "SPCC rev.9_September 2009.doc" deleted by Martin Matlin/R3/USEPA/US]
[attachment "Hazardous Waste Locations Dwg_100609.pdf" deleted by Martin Matlin/R3/USEPA/US] [attachment "Dan Miller's Training_09.pdf" deleted by Martin Matlin/R3/USEPA/US]

[attachment "DEP Report Inspection_111809.pdf" deleted by Martin Matlin/R3/USEPA/US]

BUCKS COUNTY COMMUNITY COLLEGE AND PENNSYLVANIA STATE FIRE ACADEMY

This certifies that **Daniel L. Miller**
has successfully completed a course of instruction

comprising **6.00 hours in** Hazmat Ops. Level Annual Refresh (HMOR)

April 7 2009

Date

Steven E. Orlosky

Instructor



09/FS FSC-0737-191
Student Id: 0524969

Barbara A. Miller

Vice President, Continuing Education,
Workforce Development and Public Safety Training

Timothy L. Cunkle

Academy Administrator



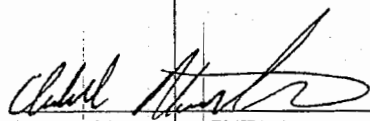
CERTIFICATE OF ATTENDANCE

DANIEL L MILLER SR.

HAS SUCCESSFULLY COMPLETED THE REQUIREMENTS FOR
EMS CONTINUING EDUCATION IN

TRAUMA SKILLS REVIEW

TUESDAY JULY 8, 2009



ADOLPH MONTANYE EMT-INSTRUCTOR

CONDUCTED BY:

*Adolph Montanye Training
& Consulting*

317 S BROAD ST
MYERSTOWN, PA. 17067
484-661-2815

DOH CON-ED CLASS NUMBER
02003383090702

DOH CON-ED HOURS 3



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

Inspection Date 11/18/09
Time Start 9:30 am
Time Finish 11/19/09 10:00 am

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATOR

EPA ID: 1844548

Company name YUASA Battery, Inc.EPA I.D. Number PAD095361655

Employer I.D. Number (EIN) _____

Site Address 2901 Montrose Ave., Laureldale, PACounty BerksMunicipality Muhlenberg TownshipZip 19605Name of Inspector Steven UngerName & Title of Responsible Official Robin Daub EHS ManagerPerson Interviewed Robin DaubTelephone (610) 929-5781

Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per Month: _____ Pounds > 1000 Kgs _____

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name Elk TransportationLicense Number PAD987271020

Transporter Name _____

License Number _____

Transporter Name _____

License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D008	Filter Press Sludge and Debris	Max Environmental Technologies, Yukon, PA
D008	Formation Sediment	EQ Detroit, Inc., Detroit, MI
F005, D001	Solvent Contaminated Rags	Giant Resource Recovery, Sumter, SC
D008	Lead Contaminated Documents on Pallets	Heritage-WTI, Inc., East Liverpool, OH
D001, D002, D008	Lead Contaminated Flux	EQ Detroit, Inc., Detroit, MI
D002	NaOH Tank Sludge	EQ Detroit, Inc., Detroit, MI
D008	Baghouse Dust and Debris	EQ Detroit, Inc., Detroit, MI

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name YUASA Battery, Inc. ID Number PAD095361655 Date 11/18/09
 1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4				REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
	X			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name YUASA Battery, Inc. ID Number PAD095361655 Date 11/18/09

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037



INSPECTION REPORT COMMENTS

Date of Inspection 11/18/09Identification Number PAD095361655Company/Facility/Site Name YUASA Battery, Inc.**Comments:**

On 11/18/09 Kalen Boyer and I conducted a hazardous waste compliance evaluation inspection at YUASA Battery, Inc. (YUASA) in Laureldale, PA. Robin Daub, the EHS Manager, was present during the inspection. The inspection started at 9:30 am with a site tour and followed on 11/19/09 at 8:00 am with a records review.

OBSERVATIONS:

- 1.) YUASA manufactures lead acid batteries for motorcycles, ATVs, snowmobiles, and other recreational vehicles.
- 2.) Hazardous waste generated on a regular basis include lead contaminated debris, waste water treatment plant filter press sludge, formation sediment, and solvent contaminated rags. Lead contaminated documents on pallets, NaOH tank sludge, and baghouse dust that could not be reclaimed were also hazardous wastes generated in 2009.
- 3.) Waste water from wet room, formation, and paste/acid mix area troughs, employee showers, and the reverse osmosis process are gravity fed to a sump and then pumped into the waste water pretreatment system where it is treated for lead and pH before discharge to the City of Reading POTW.
- 4.) Baghouse dust (sludge by definition), dross, and other lead scrap are sent to RSR, a smelter in New York, for reclamation.
- 5.) One 30-yard hazardous waste rolloff container was observed outside east of the facility. Lead contaminated debris (gloves, work clothes and PPE equipment) and filter press sludge are stored in the container. The container appeared labeled correctly and dated. The container is double lined with plastic and is tarped. A chainlink fence

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed _____

(Signature)

Date _____

Inspector _____

(Signature)

Date _____

☐ White - Vendor☐ Yellow - Regional Office☐ Pink - Inspector



INSPECTION REPORT COMMENTS

Date of Inspection 11/18/09Identification Number PAD095361655Company/Facility/Site Name YUASA Battery, Inc.**Comments:**

and gate control access to the area from the south parking area. Ms. Daub explained that security cameras are going to be installed.

6.) Hazardous waste debris is collected in various hoppers throughout the facility prior to storage in the rolloff. The hoppers are considered 90-day storage. Hoppers were observed in the plate room, pasting area, RO area, and outside the maintenance room. All hoppers appeared labeled, dated, closed, and in good condition.

7.) A satellite accumulation area was observed in the formation room. Formation sediment is accumulated in a 55-gal drum.

8.) A small hazardous waste hopper is used to collect filter press sludge.

9.) A 90 day storage area for "gutter mud" and formation sediment was observed in the scrap room. One 55-gal drum was stored. It appeared labeled correctly.

RECORDS:

1.) A PPC plan updated September 2009 was observed and appeared complete.

2.) The hazardous waste source reduction strategy was observed and appeared complete.

3.) Initial training and an annual review is conducted and records appeared complete.

4.) Manifests were observed onsite.

5.) Hazardous waste storage area inspection log was observed and appeared complete.

No Recommendations, No Violations

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed

[Signature]
(Signature)

Date

11/20/09

Inspector

[Signature]
(Signature)

Date

11/20/09

☐ White - Vendor

☐ Yellow - Regional Office

☐ Pink - Inspector